

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

THOMAS THOMPSON)

Case No. 18-1535-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 22, 2018 in the county of Chester in the
 Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

18 U S C § 2113(a)

Knowingly and unlawfully by force and violence, and by intimidation, took, from employees of the PNC Bank, lawful currency of the United States, that is approximately \$7,000, belonging to, and in the care, custody, control, management, and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation

In violation of Title 18, United States Code, Section 2113(a)

This criminal complaint is based on these facts:

Please refer to the attached affidavit

☒ Continued on the attached sheet.

Philip T. Steffan

Complainant's signature

Philip Steffan, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/28/2018

City and state: Philadelphia, Pennsylvania

Lynne A. Sitarski

Judge's signature

Honorable Lynne A. Sitarski

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Philip T. Steffan, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") currently assigned to the Philadelphia, Pennsylvania Field Office and have been so assigned since May 2013. I have been an FBI Special Agent for approximately 13 years investigating various federal criminal and national security violations. I am currently assigned to a counterintelligence squad where I primarily investigate counter proliferation matters. Additionally, I assist the FBI Philadelphia, Pennsylvania Field Office with bank robberies.

2. I am the Case Agent assigned to this investigation. This affidavit is based on, among other things, my training and experience in conducting criminal investigations, my personal knowledge, review of documents, public records, and other evidence, and conversations with other law enforcement agents and officers, including other experienced FBI Task Force Officers and Agents and law enforcement officers with whom I work. Because this affidavit is being submitted for the limited purpose of obtaining a search warrant, I have not included every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to charge THOMAS THOMPSON as set forth below.

3. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging THOMAS THOMPSON, [REDACTED], with a violation of Title 18, United States Code, Section 2113(a) (bank robbery).

4. On September 22, 2018, at about 10:45 AM, an unidentified male (UM) entered the PNC Bank located at 1599 West Chester Pike, West Chester, Pennsylvania 19382 and approached bank/teller victim, M.M. UM presented a folded napkin with a handwritten note inside which demanded \$50 and \$100 bills. Additionally, UM produced a device with a button

from his left pocket and showed the teller the outline of a firearm under his shirt. M.M. attempted to withdraw funds from a cash dispensing machine and while doing so, the UM threatened to shoot M.M. because it was taking too long. M.M. then gave UM the cash in his teller drawer. In total, UM stole approximately \$7000 in \$50 and \$100 bills and fled the bank.

5. After UM left the bank, M.M. activated the alarm and informed the Assistant Bank Manager of the robbery. No one else in the bank (i.e., employees, customers) was aware that a robbery had occurred until after UM left the bank. M.M. described UM as an older Caucasian male, approximately 6'1" tall, approximately 165 lbs., balding and with a grey goatee, wearing transitional glasses, a plaid short-sleeved shirt and khaki pants.

6. The Westtown – East Goshen Regional Police Department (WEGOPD) and the FBI Philadelphia, Pennsylvania Field Office responded to the scene of the robbery to conduct victim and witness interviews, process the scene and collect evidence, including latent evidence such as swabs for DNA and fingerprints, as well as security camera footage. The results of the DNA and fingerprint analysis are pending.

7. Following the robbery, PNC Bank conducted an audit and determined the loss was approximately \$7,000.

8. On September 22, 2018, the Westtown – East Goshen Regional Police Department (WEGOPD) issued a press release about the robbery, including images of the robber inside the bank during the bank robbery. On September 23, 2018, WEGOPD Sergeant Jon Stafford received a call from Officer Eric Gavin of the Media, Pennsylvania Police Department. Gavin provided information that he had received from a reliable confidential informant (CI) who has, in the past, provided information that has proven reliable and helpful in the prosecution of several matters. The CI informed Officer Gavin that the robber shown in images from the

September 22, 2018 robbery of the PNC Bank, resembled THOMAS THOMPSON and that THOMPSON lived in either Brookhaven or Chester, Pennsylvania. Additionally, the CI advised that THOMPSON had a brother David, who owned a company in Aston, Pennsylvania, and that THOMAS THOMPSON had been incarcerated for a previous robbery he committed. Sergeant Stafford obtained information that THOMAS THOMPSON, with State Identification Number (SID) 139-49-90-5 was further identified as THOMAS STEPHEN THOMPSON, [REDACTED], [REDACTED], and a residential address 1737 W. Erie Avenue, Apt #3, Philadelphia, Pennsylvania 19140. THOMPSON's social security number was also provided but not listed here to protect this personal information.

9. A review of a National Crime Information Center (NCIC) multi-state criminal history report for THOMPSON indicated that he has an extensive criminal history. THOMPSON has been arrested approximately 21 times for misdemeanor and felony charges to include theft, burglary, robbery, carrying a firearm, receiving stolen property, and larceny. THOMPSON has eleven convictions for offenses including robbery, burglary, theft, receiving stolen property, unauthorized use of automobiles, VUFA, and terroristic threats. According to THOMPSON's state parole officer, THOMPSON is currently residing at the Kintock Halfway House located at 301 East Erie Avenue, Philadelphia, as a result of his most recent conviction for robbery.¹

10. Checks with the Pennsylvania Bureau of Motor Vehicles identified a 2009 Toyota Camry, Pennsylvania license plate number KSV-8461, vehicle identification number (VIN) 4T1BF46K79U376738, registered to THOMPSON. A license plate reader (LPR) report was ran

¹ The Kintock Group is a non-profit organization with contracts with federal, state and county law enforcement agencies to provide cost effective alternatives to incarceration and re-entry services for individuals transitioning from the criminal justice system to the community.

for Pennsylvania license plate number KSV8461 on September 23, 2018. Several positive results were returned between June 30, 2018 and September 6, 2018, all of which showed this vehicle at various locations in Philadelphia, Pennsylvania. In addition, several of the LPR photographs show the above vehicle with a distinctly dark colored trunk lid.

11. As part of the investigation, investigators obtained CCTV footage from Thornton's Gulf service station, located at 1640 West Chester Pike, West Chester, Pennsylvania 19382. That video shows a tan colored Toyota Camry with a dark colored trunk lid traveling eastbound on West Chester Pike towards Philadelphia at approximately 10:51 AM on September 22, 2018, approximately six minutes after the robbery occurred. The eastbound direction toward Philadelphia is a direction of travel away from the area where the bank is located. Thornton's Gulf is located approximately 0.7 of a mile east of the PNC Bank, which is also on West Chester Pike.

12. Review of License Plate Reader (LPR) records also showed a vehicle with Pennsylvania license plate number KSV-8461 parked on Whitaker Avenue, Philadelphia, Pennsylvania, directly across the street from the Kintock Halfway House, THOMPSON's residence, on August 24, 2018, September 5, 2018 and September 6, 2018.

13. On September 24, 2018, THOMPSON's State Parole Agent was interviewed and advised that he is responsible for THOMPSON's following his release from prison following his conviction and sentence for robbery. The Parole Agent confirmed that THOMPSON has resided at the Kintock Halfway House located at 301 East Erie Avenue, Philadelphia, Pennsylvania 19134, since his release from prison. According to the Parole Agent, THOMPSON is assigned to Dorm 3, section C and bed #13. THOMPSON has a tall blue locker secured with a combination lock and this locker located next to THOMPSON's assigned bed.

14. I have reviewed security camera footage from the September 22, 2018 robbery of the PNC Bank located at 1599 West Chester Pike, West Chester, Pennsylvania 19382, and compared images of the person shown in the video robbing the bank with a known photograph of THOMPSON obtained from the Department of Motor Vehicles. Based on my review, I have determined that the robber in the video appears to be THOMPSON.

15. As previously stated, the victim teller (M.M.), was interviewed and provided a description of the bank robber. According to M.M., the robber was wearing transitional eyeglasses, a blue and white plaid short sleeved shirt, gray shoes with white soles, and khaki pants. The robber held a small, round, black or dark colored object.

16. Additionally, I am aware of two other bank robberies that occurred in Delaware with similar modus operandi. Those robberies include the following: 1) the September 18, 2018 at approximately 11:14 AM robbery of the Wells Fargo Bank located at 2011 Concord Pike, Wilmington, DE; and 2) the September 19, 2018 at approximately 2:18 PM robbery of the Wells Fargo Bank located at 1424 North Dupont Highway, New Castle, DE.

17. I reviewed security camera footage from these two bank robberies in Delaware. The video showed that the robber appears to be THOMAS THOMPSON. This is based upon my comparison of the same known photograph of THOMPSON obtained from the Department of Motor Vehicles, with the surveillance footage from both of the Delaware bank robberies.

18. A review of that security camera footage also showed numerous articles of clothing worn by the robber including a dark colored bucket type hat, dark wrap-around style sunglasses, blue jeans, gray shoes, and a blue t-shirt.

19. During the robbery of the Wilmington Wells Fargo Bank on September 18, 2018, the UM left a handwritten demand note written on a white lined piece of paper with a distinctive

number “3” logo. This logo is associated with a NASCAR race team. The robber also implied that he was armed with an explosive when he demanded the bank’s money.

20. During the robbery of the Wilmington Wells Fargo Bank on September 19th, the robber similarly implied that he was armed with some type of explosive when he demanded the bank’s money.

21. On September 26, 2018, THOMPSON’s State Parole Agent provided additional information regarding THOMPSON. The Agent reported that according to records provided by the Kintock Halfway House in Philadelphia, Pennsylvania, THOMPSON checked out for work on September 18th from 6:19 AM to 5:20 PM. He checked out of the facility for work on September 19th from 6:15 AM to 5:50 PM. He again checked out for work on September 22nd from 6:30 AM to 12:27 PM and had a social pass from 1:01 PM to 8:40 PM. In addition, THOMPSON’s Parole Agent provided still photos of THOMPSON leaving the facility on September 18th and September 22nd. A careful comparison of the still photo taken of THOMPSON leaving Kintock Halfway House on September 18th, and bank surveillance photos taken at the Wells Fargo Bank robbed on September 18th, shows the robber wearing the same blue t-shirt and dark colored pants.

22. On September 27, 2018, I along with other investigators conducted surveillance in the area around Kintock Halfway House. While doing so, I observed Thompson leave the Kintock Halfway House at approximately 6:15 AM and enter the tan Toyota Camry with dark trunk lid. The vehicle was parked on Whitaker Avenue directly across from the Kintock Halfway House.

23. On September 28, 2018, I obtained search warrants for THOMPSON’s locker at the Kintock Halfway House and THOMPSON’s Toyota Camry, both of which are described

above. On September 28, 2018, those search warrants were executed. The following items were recovered:

From THOMPSON's locker:

- five (5) blue t-shirts similar to shirt worn by UM in both robberies of Wells Fargo Banks in Delaware on 09/18/2018 and 09/19/2018;
- one (1) pair of khaki cargo pants similar to the pants worn the UM during the robbery of the PNC Bank in West Chester on 09/22/2018;
- one (1) pair of jeans similar to the pants worn by the UM during the robber of the Wells Fargo Bank in Delaware on 09/18/2018;
- one (1) receipt for the purchase of a telephone; and
- three (3) \$20 bills.

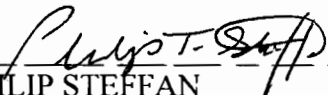
From THOMPSON's Toyota Camry:

- Vehicle Registration showing the above Toyota Camry was registered to THOMPSON;
- Athletic shoes men's size 10 with white soles similar to those worn by UM during the robbery of the PNC Bank on 09/22/2018;
- One (1) phone magnet with the word "Youse" and logo, similar to the button device used by UM during the robbery of a Wells Fargo Bank in Delaware;
- One (1) box cutter;
- Miscellaneous gift and identification cards including casino gambling cards;
- Folded notepad paper with the NASCAR logo #3 containing a powdery white substance (believed to be heroin);
- Eyeglasses with case similar to those worn by UM during the bank robbery of the PNC Bank on 09/22/2018;
- Notepad with sheets of paper containing the NASACR logo #3, similar to a note used by UM during a robbery in Delaware;
- Two (2) pens.

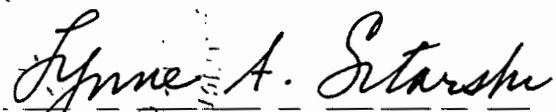
24. The deposits of the PNC Bank are insured by the Federal Deposit Insurance Corporation (FDIC) and were insured by the FDIC at the time of the aforementioned bank robbery described above.

25. Based on all of the aforementioned information, I believe there is probable cause to charge THOMAS THOMPSON with the September 22, 2018 robbery of the PNC Bank,

located at 1599 West Chester Pike, West Chester, Pennsylvania 19382, in violation of Title 18,
United States Code, Section 2113(a).


PHILIP STEFFAN
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 28th day of
September, 2018


HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge